

2155.027

**Smith & Duggan LLP
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Boston, MA 02108-1906
Tax I.D. No.: 04-3067315**

**Mary Catherine Sexton, Esq.
GES Exposition Services, Inc.
950 Grier Dr., P.O.Box 98790
Las Vegas, NV 89193-8790
Our File No.: 2155.027**

May 25, 2004

**In reference to: Moshen Hoseini Corporate Compliance Issue
Interim Bill Through March 31, 2004**

			<u>Hrs/Rate</u>	<u>Amount</u>
3/22/04	CAD	Telephone call from Attorney Mary Catherine Sexton regarding new matter involving potential union conflict and charges of physical assault against GES employee; prepare notes and outline of work to be done; contact court and obtain charge sheet; conference with Attorney Butler regarding new matter and defense of Mr. Hosseini; follow up call to Attorney Sexton regarding developments and status of investigation	2.50 @225.00/hr	
	GAB	Conference with Attorney Duggan regarding arrest of Moshen Hosseini and need to bail him from Boston police lock up facility	0.40 @160.00/hr	64.00
	GAB	Telephone conference with Boston police department confirming the arrest, custody and arraignment of Mr. Hosseini	0.10 @160.00/hr	16.00
	GAB	Draft correspondence to Boston police department regarding representation of Mr. Hosseini and request no further questioning take place	0.30 @160.00/hr	48.00
	GAB	Travel to court for arraignment of Mr. Hosseini	0.20 @160.00/hr	32.00
	GAB	Conference with Mr. Hosseini regarding circumstances of arrest and background necessary for bail hearing	0.40 @160.00/hr	64.00
	GAB	Participate in arraignment of Mr. Hosseini	0.20 @160.00/hr	32.00
	GAB	Conference with Mr. Hosseini regarding obligations imposed upon him by court's release on personal recognizance and future court proceedings	0.20 @160.00/hr	32.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
	GAB	Travel from court from arraignment of Mr. Hosseini	0.30 @160.00/hr	48.00
	GAB	Telephone conference with Mary Catherine Sexton, and Attorney Duggan regarding the factual circumstances of the criminal case against Mr. Hosseini	0.30 @160.00/hr	
	GAB	Conference with Attorney Duggan regarding strategy to defend Mr. Hosseini	0.70 @160.00/hr	112.00
	GAB	Telephone conference with Mr. Hosseini regarding the identification of his accuser	0.10 @160.00/hr	16.00
3/23/04	CAD	Conference call with Mr. Hosseini and Attorney Butler; follow up conference with GES personnel; review docket sheet; legal research regarding GES' liability exposure; review case law on Abuse of Process and Malicious Prosecution for potential civil action against Bavis or others bringing the claims	4.00 @225.00/hr	900.00
	GAB	Legal research on Rules of Professional Conduct regarding GES's payment of services rendered to Mr. Hosseini	0.30 @160.00/hr	
	GAB	Conference with Attorney Duggan regarding investigative strategy of matter	0.80 @160.00/hr	128.00
	GAB	Telephone conference with Mary Catherine Sexton, Joseph Sangregorio and Attorney Duggan regarding issues of compliance with company policies	0.30 @160.00/hr	
	GAB	Telephone conference with Steve Casterline regarding his willingness to attend conference with Attorney Duggan and me regarding criminal allegations	0.10 @160.00/hr	16.00
	GAB	Receive and review correspondence from Ms. Sexton to Mr. Twist concerning representation provided for Mr. Hosseini	0.10 @160.00/hr	
	GAB	Telephone conference with Mr. Hosseini confirming tomorrow's conference	0.10 @160.00/hr	16.00
	GAB	Receive and review correspondence from Joseph Sangregorio regarding Mr. Casterline's report of his investigation of complaints against Mr. Hosseini	0.10 @160.00/hr	16.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/24/04	CAD	Prepare for and meet with Mr. Moshen Hosseini; prepare memorandum summarizing information obtained by Mr Hosseini; telephone call to Attorney Sexton regarding meeting with client and outlining background of union split underlying the current allegations against Hosseini	4.00 @225.00/hr	900.00
	CAD	Meet with Steve Castoline and prepare memorandum outlining information given by Mr. Castoline	1.30 @225.00/hr	292.50
	CAD	Conference with Joseph Sangregorio regarding current state of claims, history of Moshen with the company and history of union split; conference with Joe Perry regarding history	0.50 @225.00/hr	112.50
	GAB	Receive and review Attorney Duggan correspondence to Ms. Sexton regarding intention to send conflict letter	0.10 @160.00/hr	
	GAB	Work on conflict issues letter for Mr. Hosseini	0.90 @160.00/hr	144.00
	GAB	Conference with Mr. Hosseini and Attorney Duggan regarding factual circumstances surrounding relationship with accuser	3.30 @160.00/hr	528.00
	GAB	Conference with Mr. Casterline regarding circumstances surrounding work relationship of Mr. Hosseini and labor pool for GES in Boston	1.40 @160.00/hr	224.00
	GAB	Review show schedules for December, January, February and March provided by Mr. Casterline	0.30 @160.00/hr	48.00
	GAB	Telephone conference with GES employee James Flynn and Attorney Duggan regarding Flynn's interview by Boston Police Detective Schroeder	0.40 @160.00/hr	64.00
	GAB	Develop strategy for acquiring information from Detective Schroeder and providing helpful information to her without compromising defense	0.50 @160.00/hr	80.00
3/25/04	GAB	Draft memorandum to file regarding Mr. Casterline's report of union employee Dimikas's attempted extortion	0.20 @160.00/hr	32.00
	GAB	Develop strategy for obtaining police reports informally in an expedited manner	0.60 @160.00/hr	96.00
	GAB	Telephone conference with Detective Schroeder regarding status of her report preparation, allegations of a second complainant, and labor disputes with two complainants to explain motive to fabricate	0.20 @160.00/hr	32.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/25/04	GAB	Telephone conference with Attorney Duggan regarding new allegations concerning second complainant	0.20 @160.00/hr	32.00
	GAB	Telephone conference with Assistant District Attorney William Galvin concerning circumstances of case	0.20 @160.00/hr	32.00
3/26/04	GAB	Telephone conference with Attorney Duggan regarding strategy for interviewing witnesses	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Mr. Hosseini regarding status of investigation and his whereabouts on December 22, 2003 and February 29, 2004	0.20 @160.00/hr	32.00
3/30/04	CAD	Telephone call from Mary Catherine Sexton regarding potential for Moshen to work in New York	0.20 @225.00/hr	45.00
	CAD	Conference with Attorney Butler regarding upcoming Pre-Trial Conference in criminal court	0.10 @225.00/hr	22.50
	GAB	Telephone conference with Attorney Duggan regarding the fact that there are no travel restrictions on Mr. Hosseini that will preclude out-of-state GES assignments	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Kevin McGuire, head of security at Hynes CC, to discuss facts surrounding complainants' work at Hynes; draft memorandum regarding same	0.40 @160.00/hr	64.00
	GAB	Telephone conference with Attorney Duggan regarding progress of investigation	0.20 @160.00/hr	32.00
3/31/04	GAB	Telephone conference with John Perry, union business agent, regarding background of two accusers and circumstances of work environment	0.30 @160.00/hr	48.00
	GAB	Draft memorandum regarding telephone conference with John Perry, union business agent, regarding background of two accusers and circumstances of work environment	0.10 @160.00/hr	16.00
	GAB	Telephone conference with Joseph Sangregorio and Maryanne Passiatore regarding various employment records that will assist in defense of Mohsen Hosseini	0.60 @160.00/hr	96.00
	GAB	Draft correspondence to Joseph Sangregorio requesting various employment records that will assist in defense of Mohsen Hosseini	0.50 @160.00/hr	80.00

For professional services rendered

28.40